

EXHIBIT B

	Original Deponent List	August 17, 2023 List
1.	Shanker Ramamurthy (Deposition Notice served May 6, 2022) Deposition occurred September 7, 2023	
2.	Pablo Suarez (Deposition Notice served May 6, 2022) Deposition scheduled for September 27, 2023	
3.	Anthony Lipp (Deposition Notice served May 24, 2022) * Mr. Lipp left IBM on August 7, 2023	
4.	William Fuessler (Notice of Subpoena served June 10, 2022) Deposition scheduled for September 14, 2023	
5.	Tom Eck (Notice of Subpoena served June 10, 2022) * Mr. Eck left IBM in September 2020	
6.	Jean-Stéphane Payraudeau (Deposition Notice served May 24, 2022)	Mark Foster (not yet subpoenaed, but IBM will produce him; Plaintiff rejected September 19)
7.	Sarah Diamond (Notice of Subpoena served June 10, 2022)	Peter Korsten (not yet noticed, but IBM will produce him; Plaintiff accepted September 22)
8.	Michael Andrud (Notice of Subpoena served June 10, 2022)	Jesus Mantas (not yet noticed, but IBM will produce him; offered September 22)
9.	Bethel Desmond (Notice of Subpoena served June 10, 2022)	Chae An (not yet subpoenaed, but IBM will produce him; Plaintiff rejected September 20) - or - Bridget van Kralingen (not yet subpoenaed) * Ms. van Kralingen left IBM in 2021
10.	30(b)(6) Deposition Notice (served May 24, 2022)	Amended 30(b)(6) Notice (served August 31, 2023)